



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM VALDEZ,

Defendant.

CR 2:22-cr-00319-GW

I N D I C T M E N T

[18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm and Ammunition; 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

[18 U.S.C. § 922(g)(1)]

On or about May 9, 2022, in Santa Barbara County, within the Central District of California, defendant ADAM VALDEZ knowingly possessed a firearm, namely, a Smith & Wesson, Model M&P, .22 caliber pistol, bearing serial number HHU9099, and ammunition, namely, approximately five rounds of Federal Cartridge Company .22 caliber ammunition and five rounds of Winchester .22 caliber cartridge ammunition, in and affecting interstate and foreign commerce.

Defendant VALDEZ possessed such firearm and ammunition knowing that he had previously been convicted of at least one of the

1 following felony crimes, each punishable by a term of imprisonment
2 exceeding one year:

3 1. Unlawful Sexual Intercourse with a Minor, in violation of
4 California Penal Code Section 261.5(c), in the Superior Court for the
5 State of California, County of Santa Barbara, Case Number SM107530,
6 on or about May 6, 1998;

7 2. Transportation of a Controlled Substance, in violation of
8 California Health & Safety Code Section 11379(a), in the Superior
9 Court of the State of California, County of Santa Barbara, Case
10 number 1142649, on or about March 3, 2005;

11 3. Reckless Evading of a Peace Officer, in violation of
12 California Vehicle Code Section 2800.2(a), in the Superior Court for
13 the State of California, County of Santa Barbara, Case number
14 1142649, on or about March 3, 2005;

15 4. Possession of Controlled Substance with a Firearm, in
16 violation of California Health & Safety Code Section 11370.1(a), in
17 the Superior Court for the State of California, County of Santa
18 Barbara, Case number 1142649, on or about March 3, 2005;

19 5. Possession of a Firearm by a Felon, in violation of
20 California Penal Code Section 12021(a)(1), in the Superior Court for
21 the State of California, County of Santa Barbara, Case number
22 1142649, on or about March 3, 2005;

23 6. Possession for Sale of a Controlled Substance, in violation
24 of California Health & Safety Code Section 11378, in the Superior
25 Court for the State of California, County of Santa Barbara, Case
26 number 1142649, on or about March 3, 2005; and

27 7. Possession of a Controlled Substance for Sale, in violation
28 of California Health & Safety Code Section 11378, in the Superior

1 Court for the State of California, County of Santa Barbara, Case
2 Number 19CR00926, on or about July 1, 2019.

FORFEITURE ALLEGATION

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), in the event of defendant's conviction of the offense set forth in this Indictment.

2. If so convicted, the defendant shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof

(a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3 A TRUE BILL

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5 /S/

6
7 Foreperson

8 STEPHANIE S. CHRISTENSEN
9 Acting United States Attorney

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11 SCOTT M. GARRINGER
12 Assistant United States Attorney
13 Chief, Criminal Division

14 DAVID T. RYAN
15 Assistant United States Attorney
16 Deputy Chief, General Crimes
17 Section

18 DOMINIQUE CAAMANO
19 Assistant United States Attorney
20 General Crimes Section
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